



EPSTEIN DRANGEL LLP

60 East 42nd Street, Suite 1250, New York, NY 10017  
 T: 212.292.5390 • E: mail@ipcounselors.com  
[www.ipcounselors.com](http://www.ipcounselors.com)

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April 26, 2023

**VIA ECF**

Hon. Analisa Torres  
 United States District Judge  
 Daniel Patrick Moynihan  
 United States Courthouse  
 500 Pearl Street  
 New York, New York 10007

**Re: Moonbug Entertainment Ltd., et al. v. 640350 Store, et al.**  
**Case No. 22-cv-5042 (AT)**  
**Fourth Request For Extension of Time to File Motion for Default Judgment**

Dear Judge Torres,

We represent Plaintiffs Moonbug Entertainment Limited and Treasure Studio Inc. (“Plaintiffs”), in the above-referenced matter (the “Action”).<sup>1</sup> On November 29, 2022, the Court entered an Order directing Plaintiffs to file their Motion for Default Judgment by no later than January 30, 2023. (Dkt. 31). On January 20, 2023, Plaintiffs requested an extension of time, until March 3, 2023, to file their Motion for Default Judgment, which the Court granted. (Dkt. 35). On March 15, 2023, Plaintiffs requested an extension of time, until April 28, 2023, to file their Motion for Default Judgment, which the Court granted. (Dkt. 37). For the reasons detailed below, Plaintiffs respectfully request a fourth, and expected final, extension of time to file their Motion for Default Judgment. In accordance with Your Honor’s Individual Rules of Practice, Plaintiffs respectfully submit the following:

1. **Original Deadline:** April 28, 2023
2. **The number of previous requests for adjournment:** Three, this is the fourth request for an extension of time to file Plaintiffs’ Motion for Default Judgment.
3. **The reason for the current request:** As indicated in Plaintiffs’ second and third requests for an extension of time, AliExpress provided Epstein Drangel with the requested data evidencing Defaulting Defendants’ sales of Counterfeit Products to consumers located in New York (“AliExpress Data”) to support Plaintiffs’ claim for personal jurisdiction. However, upon review, Epstein Drangel discovered that there were errors in the AliExpress Data. Epstein Drangel requested clarification and full and accurate data from AliExpress. After several weeks of follow up, counsel for AliExpress advised, for the first time today, April 26, 2023, that AliExpress would be able to provide the complete AliExpress Data requested by Plaintiffs, but would need approximately two (2) to three (3) weeks to provide such information. Since counsel for

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<sup>1</sup> Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiffs’ Complaint or Application.

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AliExpress provided a firm timeframe and agreed to produce the AliExpress Data, Epstein Drangel expects that this will be Plaintiffs' final request for an extension of time.

4. **Whether the adversary consents:** All of the Defendants remaining in this Action are currently in default, thus Plaintiffs did not seek their consent.
5. **Proposed alternative dates:** Plaintiffs respectfully propose filing their Motion for Default Judgment by no later than May 26, 2023 to allow AliExpress three (3) weeks to provide Epstein Drangel with the AliExpress Data and to allow Epstein Drangel time to review the AliExpress Data provided and incorporate it in Plaintiffs' Motion for Default Judgment.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

**EPSTEIN DRANGEL LLP**

BY: /s/ Danielle S. Futterman  
Danielle S. Futterman (DY 4228)  
dfutterman@ipcounselors.com  
60 East 42nd Street, Suite 1250  
New York, NY 10165  
Telephone: (212) 292-5390  
Facsimile: (212) 292-5391  
Attorneys for Plaintiffs  
*Moonbug Entertainment Limited and Treasure Studio Inc.*

GRANTED.

SO ORDERED.

Dated: April 27, 2023  
New York, New York

  
ANALISA TORRES  
United States District Judge